

1 ERIC W. SWANIS, ESQ.
2 Nevada Bar No. 06840
3 BETHANY L. RABE, ESQ.
4 Nevada Bar No. 11691
5 JOEL M. EADS, ESQ.*
6 **Admitted Pro Hac Vice*
7 **GREENBERG TRAURIG, LLP**
8 10845 Griffith Peak Drive, Suite 600
9 Las Vegas, Nevada 89135
Telephone: (702) 792-3773
Facsimile: (702) 792-9002
Email: swanise@gtlaw.com
rabeb@gtlaw.com
joel.eads@gtlaw.com

10 *Counsel for Defendants*

11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 LING CAI et al.;

Case No. 2:23-cv-00050-NJK

14 Plaintiffs,

15 v.
16 **STIPULATION AND PROPOSED**
17 **ORDER TO EXTEND TIME FOR**
18 **SUBMITTING DISMISSAL PAPERS**

[SECOND REQUEST]

Defendants.

19 Defendants Enterprise Rent-A-Car OF San Francisco, LLC d/b/a “Alamo,” Rental Insurance
20 Services, Inc., ELCO Administrative Services Co. d/b/a “Rental Claims Services” and ACE American
21 Insurance Company (collectively, the “Defendants”), by and through their undersigned counsel, and
22 Plaintiffs Ling Cai, Jing Xu, Z.X. a minor by and through his Natural Parent Jing Xu, and Tammy
23 Harless, as Special Administrator of the Estate of Zhongping Zhou (“Plaintiffs” and collectively with
24 Defendant, the “Parties”), by and through their undersigned counsel, hereby stipulate to extend the
25 deadline to submit dismissal papers by thirty (30) days, from September 30, 2024 to October 30, 2024.

26 This case has settled. *See* ECF No. 80. On July 15, 2024, this Court entered an order providing
27 that dismissal papers must be filed by August 30, 2024. *See* ECF No. 81. On September 3, 2024, the
28

1 Court entered an order [ECF No. 83] extending that deadline until September 30, 2024 pursuant to the
2 Parties' stipulation [ECF No. 82] regarding the same.

3 The Parties have continued to diligently work to finalize the settlement and submit the dismissal
4 papers pursuant to the Court's order, including preparation of and revisions to the draft, written
5 settlement agreement. However, various unavoidable delays and issues have continued to hamper the
6 Parties' ability to finalize the dismissal papers, including those associated with the Plaintiffs living in
7 China, the specific allocation and apportionment of the settlement funds among the Plaintiffs,
8 communication and interpretation issues, and the fact that the agreement contains relatively uncommon
9 terms such as a minor's compromise and probate court approval. As such, the Parties stipulate and
10 agree, and respectfully request an order from the Court, that the time to file dismissal papers be extended
11 by thirty (30) days, to October 30, 2024. If the Parties are able to submit such papers sooner, they will
12 do so.

13 This stipulation is made in good faith and not for purposes of delay.

14 **IT IS SO STIPULATED.**

15 DATED this 30th day of September, 2024.

16 **THE 702 FIRM**

17 */s/ Michael C. Kane*

18 Michael C. Kane, Esq.
19 Nevada Bar No. 10096
20 Bradley J. Meyers, Esq.
21 Nevada Bar No. 8857
22 8335 W. Flamingo Road
23 Las Vegas, Nevada 89147

24 *Counsel for Plaintiffs*

25 DATED this 30th day of September, 2024.

26 **GREENBERG TRAURIG, LLP**

27 */s/ Eric W. Swanis*

28 Eric W. Swanis, Esq.
Nevada Bar No. 06840
Bethany L. Rabe, Esq.
Nevada Bar No. 11691
10845 Griffith Peak Drive, Suite 600
Las Vegas, Nevada 89135

29 *Counsel for Defendants*

30 **IT IS SO ORDERED.**



31 UNITED STATES MAGISTRATE JUDGE

32 DATED: October 1, 2024